

## Robocall Mitigation Plan for Metropark Communication, Inc.

This mitigation plan describes the process and procedures that Metropark Communications, Inc., Metropark hereafter, uses to alleviate the origination of illegal robocalls on its network.

1. Customer Interaction: Metropark takes the following steps with respect to its customers to prevent originating robocalls.
  - a) Metropark verifies new business customers are legitimate by using Tax Identification Number and a soft Inquiry ;
  - b) Metropark has adopted a “Voice Services Acceptable Use Policy” that describes action taken for illegal robocalls. This “Voice Services Acceptable Use Policy” is available on Metropark’s Polices & Notices website at <https://www.metropark.com/tc> ;
  - c) Metropark provides customer education to its customers about robocalls. The robocall customer education information is on Metropark’s website at <https://www.metropark.com/robocall> ;
  - d) Metropark’s Robocall Mitigation Plan is on Metropark’s website at <https://www.metropark.com/robocall/mitigationplan.pdf> ;
  - e) Metropark encourages its customers to enroll in the Do Not Call Registry when they sign up for service, through email notifications, and on its website at <https://www.metropark.com/donotcall>
2. Originating Traffic Monitoring: Metropark is using the bandwidth.com switching voice network which has deployed STIR/SHAKEN in the network as of December 2019. Metropark depends on Bandwidth.com, who has completed interoperability with most carriers. All outbound calls using Bandwidth U.S. phone numbers are signed with “A” or full attestation. Outbound calls using non-Bandwidth U.S. phone numbers are signed with “B” or partial attestation. Daily reviews of reports will prompt appropriate action, in accordance with our Voice Services Acceptable Use Policy.
3. Robocall Mitigation Enforcement: We will block originating traffic identified as illegal robocalls and may terminate service entirely, in accordance with its Voice Services Acceptable Use Policy which prohibits the use of telephone numbers for illegal robocalls and fraudulent purposes. Telephone numbers flagged as being used for illegal robocalls will be reported to the FCC and FTC. We block calls originating from invalid numbers per the FCC’s 2017 Call Blocking Order. Metropark uses the bandwidth.com switching voice network which monitors traffic on its network and identifies potentially unlawful call origination activity.
4. Traceback requests: Metropark will fully comply and assist with all traceback requests from the FCC, law enforcement and the industry traceback consortium.

5. Point of Contact for Robocall Mitigation Efforts:

Dan Hefti, Network Manager

Office: 314-336-3967

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6. Implementation Deadline: Metropark is small voice service provider with less than 100,000 subscribers and is exempt from the requirements of full STIR/SHAKEN protocols through June 30, 2023.

Submitted by:

Brent Hake

Chief Operating Officer

Metropark Communications, Inc.